

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

RAUL KOPALEISHVILI,  Plaintiff,  vs.  UZBEK LOGISTICS, INC., et al.  Defendants.	Case No. 1:17-CV-00702-TSB  Judge Timothy S. Black
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**JOINT MOTION FOR CONTINUANCE OF DEADLINES**

Plaintiff Raul Kopaleishvili, Defendant Uzbek Logistics, Inc. and Defendant Uzbek Transport Express, LLC, respectfully request that the Court continue the pending deadlines set in Docket Text and Notation Order dated March 28, 2018 by two weeks. A memorandum in support is attached.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT**

The Docket Text and Notation Order entered in this case on March 28, 2018 sets the deadline for Pre-Class Certification Discovery on June 15, 2018 and the deadline for Plaintiff's Motion for Class Certification to be filed on July 16, 2018. The parties have been engaged in ongoing discussions regarding document production for settlement negotiations.

These discussions have delayed facilitation of necessary Pre-Class Certification Discovery. Consequently, Defendants respectfully request that the Court continue the pre-certification discovery deadline to June 29, 2018 and the deadline for filing a motion for class certification to July 30, 2018.

The relief sought in this Motion is requested for good cause as set forth above and not for the purpose of delay. This motion is filed jointly by all parties to the action.

WHEREFORE, Plaintiff Raul Kopaleishvili, Defendant Uzbek Logistics, Inc. and Defendant Uzbek Transport Express, LLC, respectfully request that the Court continue the Pre-Certification Discovery deadline and the deadline for Plaintiff to file his Motion for Class Certification to June 29, 2018 and July 30, 2018 respectively.

Respectfully submitted,

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